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Via ECF and hand delivery

January 9, 2018

Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 17A
New York, NY 10007

Re: Carlos M. Salas et al. v. Peter Salas et al.,
Case No.: 16-cv-2248

Dear Magistrate Judge Freeman:

We represent Plaintiffs Carlos M. Salas and Ada Cristina Salas in the above captioned matter. On December 20, 2017, Plaintiffs submitted a letter motion seeking to compel Defendants to produce relevant documents previously requested and then requested at the Deposition of Peter Salas or to sanction Defendants for their conduct, as well as attorney's fees incurred as a result of Defendants' tactics.

Pursuant to Your Honor's Individual Practice Rules Section I.D, opposition to letter motions shall be filed within three days of the moving letter. Defendants have failed to oppose or otherwise respond to Plaintiffs' motion, and thus are in default. Additionally, Defendants have yet to cure their deficiencies in their production or produce the documents requested at the deposition of Defendant Peter Salas, which were also reiterated in Plaintiffs' December 20, 2017 letter.

Defendants' continued failure and refusal to comply with their discovery obligations let alone even respond to Plaintiffs' letter only underscores the need for the Court to grant the relief sought. Plaintiffs therefore respectfully request various appropriate forms of relief to sanction Defendants' discovery abuses including: compelling Defendants to produce the requested documents; entering an adverse inference; striking Defendants' pleadings; precluding Defendants from entering evidence against the proofs submitted by Plaintiffs; and/or monetary sanctions in the form of an award of all attorneys' fees incurred in connection with the multiple discovery disputes.

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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Alex Litt', written in a cursive style.

Alex Litt

Enclosure

cc: Daniel Osborn, Esq. (via ECF and email)
Attorney for Defendants